

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

\*\*\*\*\*

UNITED STATES OF AMERICA

v.

Criminal Action No.  
5:13-CR- 143 (NAM)

DAVID J. RENZ,

INDICTMENT

Vio: 18 U.S.C. §2252A(a)(2)(A)  
18 U.S.C. §2252A(a)(5)(B)

Defendant.

\*\*\*\*\*

(Onondaga County)

**THE GRAND JURY CHARGES:**  
**COUNT ONE**  
**[RECEIPT OF CHILD PORNOGRAPHY]**

From in about 2010 to in or about June 2012, in Onondaga County, in the Northern District  
of New York,

**DAVID J. RENZ,**

the defendant herein, did knowingly receive child pornography that, using a means and facility of  
interstate and foreign commerce, had been transported in and affecting interstate and foreign  
commerce by any means, including by computer, in that the defendant, using a computer connected  
to the Internet, that is: a black homemade "Coolermaster" computer, downloaded numerous graphic  
image and video files of a minor and minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2256(8)(A).

**COUNT TWO**  
**[POSSESSION OF CHILD PORNOGRAPHY]**

On or about January 9, 2013, in Onondaga County, in the Northern District of New York,

**DAVID J. RENZ,**

the defendant herein, did knowingly possess material that contained one or more images of child pornography that had been transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is: one Imation DVD-R\16x DVD, manufactured outside the state of New York, which contained numerous graphic image and video files of one or more minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2256(8)(A).

**COUNT THREE**  
**[POSSESSION OF CHILD PORNOGRAPHY]**

On or about January 9, 2013, in Onondaga County, in the Northern District of New York,

**DAVID J. RENZ,**

the defendant herein, did knowingly possess material that contained one or more images of child pornography that had been transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is: one Verbatim DVD/R/8x DVD, bearing the handwritten label: "Archive 7 (5/13/06)," manufactured outside the state of New York, which contained numerous graphic video files of one or more minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2256(8)(A).

**COUNT FOUR**  
**[POSSESSION OF CHILD PORNOGRAPHY]**

On or about January 9, 2013, in Onondaga County, in the Northern District of New York,

**DAVID J. RENZ,**

the defendant herein, did knowingly possess material that contained one or more images of child pornography that had been transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is: one Verbatim DVD/R/8x DVD, bearing the handwritten label: "Archive 14 (8/23/06)," manufactured outside the state of New York, which contained numerous graphic video files of one or more minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2256(8)(A).

**COUNT FIVE**  
**[POSSESSION OF CHILD PORNOGRAPHY]**

On or about January 9, 2013, in Onondaga County, in the Northern District of New York,

**DAVID J. RENZ,**

the defendant herein, did knowingly possess material that contained one or more images of child pornography that had been transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is: one Verbatim DVD/R/8x DVD, bearing the handwritten label: "Archive 16 (8/23/06)," manufactured outside the state of New York, which contained numerous graphic video files of one or more minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2256(8)(A).

**COUNT SIX**  
**[POSSESSION OF CHILD PORNOGRAPHY]**

On or about January 9, 2013, in Onondaga County, in the Northern District of New York,

**DAVID J. RENZ,**

the defendant herein, did knowingly possess material that contained one or more images of child pornography that had been transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is: one Imation CD-R, manufactured outside the state of New York, which contained numerous graphic video files of one or more minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2256(8)(A).

**FORFEITURE ALLEGATION**

The allegations contained in Counts One through Six of this Indictment are hereby realleged and incorporated by reference for the purposes of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A, the defendant, **DAVID J. RENZ**, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252 or 2252A, and any book, magazine, periodical, film, videotape, and other matter which contains any such visual depiction, which

was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses, and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, and any property traceable to such property.

The property to be forfeited includes, but is not limited to, the following:

- (a) one Black homemade "Coolermaster" computer tower containing a Western Digital WD3200AAKS 320GB SATA hard drive bearing serial number WCAV2D031789, and a Western Digital WD10EADS 1TB SATA hard drive bearing serial number WCAU47567789; and
- (b) five dvd/cds containing child pornography.

If any of the property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party,
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853 (p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

Dated: March 28, 2013

A TRUE BILL, \*Name Redacted



FOREPERSON

RICHARD S. HARTUNIAN  
United States Attorney  
Northern District of New York

By:

A handwritten signature in cursive script, appearing to read "Lisa M. Fletcher".

Lisa M. Fletcher  
Assistant U.S. Attorney  
Bar Roll #510187